

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

The SSVF Shallow Subsidy service provides a new, unique service type for SSVF grantees to use in supporting Veterans in obtaining and maintaining permanent housing. This Frequently Asked Questions document has been updated to reflect changes in regulation and policy as of November 10, 2021. Grantees are strongly encouraged to review this document in its entirety as some policy guidance has changed.

Subsidy Rate Planning and Assistance Amount Calculations

1. What is the process to determine the percentage of Shallow Subsidy for each CoC?

The SSVF Interim Rule published on November 10, 2021, allows grantees to set their subsidy rate up to 50% of Rent Reasonableness. Grantees must use the same percentage for all Veteran households served by their program. This percentage should also be uniform across SSVF grantees with shared geography in a Continuum of Care. To determine their subsidy rate, SSVF grantees are expected to engage in an equity-based planning process which will include a review of any available funds that can be used to augment the SSVF Shallow Subsidy, a review of data which includes average Veteran household cost burden and local market rents, and coordination with CoC leadership, HUD-VASH, local VA Medical Center, Continuum of Care Board and/or equivalent policy making entity and other system partners.

2. How do we set the actual subsidy amount for individual Veteran households in Shallow Subsidy service?

The grantee will use the rent amount included in the lease as the basis for calculating a household's Shallow Subsidy. All units supported by SSVF must be found to be [Rent Reasonable](#). Grantees are encouraged to update Rent Reasonable analysis for the purposes of Shallow Subsidy at the point of the Veteran's transition to the service if the original RR comparison is more than 90 days old. After the unit's rent is determined to be rent reasonable, the subsidy calculation will be based on the actual rent amount of the unit. If a grantee has set the rate at 50% for their community rate and a Veteran is leasing a unit for \$1,000 per month, the monthly subsidy amount would be \$500. A grantee's ability to help a Veteran secure a unit with a lease rent amount that is less than the Rent Reasonable amount for that unit has no bearing on the subsidy calculation; the subsidy amount is based on the rent amount included in the lease between the Veteran and landlord.

3. Can we use different Shallow Subsidy rates based on each Veteran's income or housing needs?

No. Once a grantee sets the subsidy rate, that rate must be used for all Veteran households who utilize Shallow Subsidy. If the grantee has chosen a rate of 40%, all Veterans receiving Shallow Subsidy will receive a subsidy rate of 40% of that Veteran's actual lease rent amount. For example, Veteran "Jamie" leases a unit for \$1,000 and another Veteran "Samantha" leases a unit for \$800, their actual subsidy amount will vary but the subsidy rate applied to calculate the rent will be the same. In this case, a grantee with a 40% Shallow Subsidy rate would provide a subsidy amount of \$400 on behalf of Jamie and \$320 on behalf of Samantha (each 40% of the individual Veteran's lease amount).

4. Does a Veteran household need to be living in permanent housing to be considered for the Shallow Subsidy service?

In most cases, the Veteran household would already be placed in permanent housing consistent with a progressive assistance approach. In some cases (a very small percentage of cases), Veterans may be referred to the Shallow Subsidy service at initial intake bypassing the need for rental assistance or deposits from traditional SSVF. This may be more likely to happen with HP cases. It is also possible that a Veteran placed from GPD may need minimal services, but could benefit from Shallow Subsidy after placement into permanent housing. In these situations, the Veteran would need to identify a unit with the lease signed before the subsidy amount can be set because the subsidy amount is based on a percentage of the unit rent.

Supportive Services for Veteran Families Shallow Subsidy Service FAQs

Version 3. December 2021

5. If the rent increases, does the Shallow Subsidy rental amount also increase?

If the rent increase is due to the Veteran household moving to a different (and possibly larger unit) with a different rate amount, the answer is yes. The “new” Shallow Subsidy amount would be based on the rent amount included in the new lease as long as the rent amount is determined to be rent reasonable. SSVF grantees are encouraged to ensure that enough funds exist in the budget to pay for all obligated rental assistance through the end of the project period. Allowing a Veteran to move to a larger unit is encouraged- if such a move would allow the Veteran to reunite with family or for other housing stability reasons.

If the rent increase is solely due to the landlord raising the Veteran household rent, the answer is no. According to the Code of Federal Regulations (CFR), “The rental subsidy amount will not change for the veteran family in the second year of the two-year period, even if the annual amount published changes.” Therefore, no increase in the rental subsidy amount may occur. SSVF grantees, however, may negotiate with the landlord to keep the rental amount the same. Grantees should also note, however, that upon the publication of the final rule, adjustments may be made to this guidance.

6. Say a Veteran household, due to a decrease or loss in income, has to go from Shallow Subsidy back to full RRH or HP assistance. Once the household is ready to return to the Shallow Subsidy services, do the months that they were previously in Shallow Subsidy count towards their second round in Shallow Subsidy?

Veterans at or below 30% AMI receive two full years of shallow subsidy rental assistance. The Stafford Act allows for Veteran households between 30% and 50% AMI to receive a full 2 years of shallow subsidy rental assistance if they were transitioned into the Shallow Subsidy service after March 2020. The 2-year Shallow Subsidy period does not reset regardless of how many times the Veteran household goes back and forth to traditional SSVF. Grantees should also note, however, that upon the publication of the final rule, adjustments may be made to this guidance.

7. Should Veteran households who have already begun receiving the Shallow Subsidy at 35% of FMR or rent reasonableness have their Shallow Subsidy assistance amount recalculated at the grantee’s new subsidy rate?

No. Veterans transitioned to the Shallow Subsidy service before November 10, 2021 continue to be provided the same subsidy amount guaranteed at the onset of that Veteran household transitioning to Shallow Subsidy service. Grantees should also note, however, that upon the publication of the final rule, adjustments may be made to this guidance

8. If a Veteran household was in the Shallow Subsidy service, returned to RRH or HP for a period of time, then transitioned back into Shallow Subsidy - can the Shallow Subsidy assistance be recalculated at the new subsidy rate, even if the household originally started at 35% of FMR or Rent Reasonableness?

No. Given that any back and forth to and from the Shallow Subsidy service cannot exceed 24 months, the original Shallow Subsidy assistance amount must be used. Grantees should also note, however, that upon the publication of the final rule, adjustments may be made to this guidance

9. How do grantees guarantee the Shallow Subsidy service to Veteran households for 24 months once the Shallow Subsidy funding from the American Rescue Plan is exhausted?

Grantees are required to commit two years of shallow subsidy rental assistance to households who have been transitioned into the Shallow Subsidy service (Compliance Guide on website includes more details). Grantees were awarded a separate funding stream to support Shallow Subsidies and these awards extend until September 30, 2023. Furthermore, the program office has the authority to extend these awards for an additional year. Grantees should budget and place Veteran households based on the availability of these funds. Future funding opportunities have not yet been published, but it is expected that the households receiving a Shallow Subsidy will be supported by

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

whatever SSVF funds the grantees are in possession of during that period. This may require revisions in your current program design so that existing Shallow Subsidy households are accommodated for the remaining term of the Shallow Subsidy assistance.

Targeting

10. Am I correct in understanding that the Veteran household starts with traditional RRH and HP? Once/if appropriate, the Veteran household may be considered for the Shallow Subsidy service?

Generally, yes. Shallow Subsidies are another tool in the toolbox that SSVF has to offer. In most cases, the Veteran household would already be placed in permanent housing consistent with a progressive assistance approach. In some cases (a very small percentage of cases), Veterans may be referred to the Shallow Subsidy service at initial intake bypassing the need for rental assistance or deposits from traditional SSVF. This may be more likely to happen with HP cases. One consideration for this may be what level of services the Veteran household requires. While 50% of all Shallow Subsidy awards must be used on TFA, no TFA minimum exists for traditional RRH or HP. If a Veteran initially needs more supportive services, it would be appropriate to start them in RRH or HP and then transition them to the Shallow Subsidy service when their service needs decline. Please see link for information at [Shallow Subsidy VASH Coordination And Progressive Assistance.pdf](#).

11. Would a Veteran household have to be recertified when they are offered Shallow Subsidy?

SSVF grantees should ensure the Veteran household has been certified/recertified within the past three months to document that they are eligible for SSVF prior to transitioning to Shallow Subsidy service. After entry into Shallow Subsidy, the Veteran household would not need to be recertified for 2 years.

12. Will there need to be an approval to transfer a Veteran household receiving Shallow Subsidy service between grantees?

SSVF grantees transferring a Veteran household from one grantee to another shall develop a local transfer process; no Program Office approval is necessary.

13. Does a transition to Shallow Subsidy have to go through Coordinated Entry?

The SSVF Program Office expects SSVF grantees to participate in their local Coordinated Entry process. However, it is not mandated that a Veteran household who receives traditional HP/RRH and then requires a Shallow Subsidy go through Coordinated Entry. SSVF grantees are expected to work with their local partners to develop a plan to target shallow subsidy assistance. The mechanics and procedures of how a Veteran accesses those services should be transparent and consistent within their local community/CoC.

14. Do Veteran households receiving a Shallow Subsidy have to be recertified quarterly?

No, recertifications in the Shallow Subsidy service occur every two years. However, SSVF grantees must document a Veteran household's income on a quarterly basis; it is required that this information be entered into HMIS. This HMIS entry does not impact eligibility until the 2-year recertification period for the Shallow Subsidy ends.

15. Is an SSVF grantee required to use the Homelessness Prevention Screening Tool when considering HP Veterans for the Shallow Subsidy service?

It is expected that a Veteran household who enters the Shallow Subsidy service as a homelessness prevention case would have already been enrolled in SSVF homelessness prevention upon entering SSVF. In these cases, a new HP screening assessment is not required for a Veteran to begin receiving Shallow Subsidy assistance because the Veteran would have already qualified for HP services under their original enrollment status. Similar to other uses of

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

Shallow Subsidy, grantees should work to ensure that the Shallow Subsidy service is needed for the household to retain housing.

16. Is the primary target population for Shallow Subsidies Veteran households who are currently employed?

Once a Veteran transitions to Shallow Subsidy they must be able to pay their portion of the remaining rent (unless supplemented with state/local funds); because of this, VA expects most Veterans with limited or zero income will receive traditional RRH services first given traditional RRH subsidies are far more flexible and can be based on Veteran need. Should the Veteran's income increase to a point where that household can pay their portion of the rent, the household may be a good candidate for Shallow Subsidy. Veterans on fixed income who need rental support due to market conditions are also a likely target group for Shallow Subsidies.

17. Will HUD allow for a Veteran household to keep their homeless status even if receiving Shallow Subsidy for two years?

Yes, if at program entry the Veteran household was homeless and eligible for HUD-VASH, other permanent supportive housing, or other homeless programs they retain their homeless status for the purposes of program eligibility during the 2-year period. Veterans who are housed and still enrolled in SSVF are not considered homeless for the purpose of the Annual Point in Time Count but retain the ability to transfer to other appropriate housing programs if they were eligible for those programs when they were enrolled in SSVF.

18. What happens if someone starts in a different county/CoC/geography and then moves?

Grantees should coordinate with their local CoC and review their designated catchment areas for their grant to determine the geography where Veterans come from. Target areas for community of origin should be clearly communicated. If criteria for Returning Home is met, Returning Home Guidance should be followed. Returning Home is a service that allows grantees to provide relocation services for Veterans under certain circumstances. Grantees may consult with their assigned SSVF Regional Coordinator.

19. Can Shallow Subsidy be targeted to a Veteran household who needs more assistance after first receiving traditional Rapid Rehousing or Homelessness Prevention assistance?

Yes, this is the primary intent of the Shallow Subsidy service. The VA would expect, consistent with a progressive assistance approach, that SSVF grantees will offer the Shallow Subsidy service once it is determined that the Veteran needs a longer-term rent subsidy than traditional SSVF services can offer through RRH or HP services.

20. Can we use a self-sufficiency matrix or the full VI-SPDAT to periodically track the Veteran household's improvement of overall well-being while in the Shallow Subsidy service?

Yes, but formal Common Assessment tools, of which self-sufficiency and VI-SPDAT are a couple of many, are designed to review the status of people who are currently homeless and likely would not apply here. Formal assessment tools should not be over-relied on for the purposes of case planning and facilitating services for Veterans enrolled in any type of SSVF service. The SSVF Program Office encourages all grantees to use a mix of formal and informal ways to understand the needs, choices, and strengths of the Veterans they serve. This is similar to how a grantee makes decisions to increase or decrease services in traditional SSVF services. Note, formal assessments have in some cases been found to further system inequities in homeless systems; grantees are strongly encouraged to ensure that any assessment process – whether formal or informal – further promotes equitable access and service delivery to historically disenfranchised or underserved populations.

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

Program Design

21. Can an SSVF grantee hire specialized staff to focus on helping Veteran households increase their income?

Yes, however, the SSVF Program Office also encourages grantees to work with HVRP and other Employment/income programs to assist with employment. SSVF is also required to have relationships with dedicated SOAR specialists in the community and should have staff capacity to assist in obtaining VA and mainstream income benefits. In addition, any changes in grantee staffing should also be discussed with your assigned Regional Coordinator.

22. Do we need to perform another Rent Reasonableness review when the Veteran transitions to Shallow Subsidy services?

Grantees are encouraged to update Rent Reasonable analysis for the purposes of Shallow Subsidy service at the point of the Veteran's transition if the original RR comparison is more than 90 days old.

23. Can this be used with shared housing?

Yes, Shared Housing arrangements may be a good opportunity for Veterans who need to further reduce their rental costs or where having roommates would otherwise be beneficial and preferred by the Veteran. The SSVF Shared Housing Toolkit, located on the SSVF website, is a helpful resource when reviewing Shared Housing requirements and considerations.

24. What is the guidance for domestic violence issues during Shallow Subsidy enrollment?

Safety considerations are always of paramount importance. Domestic violence situations for all households receiving SSVF assistance should be handled according to the grantees internal policies and procedures; there is no difference because the Veteran is receiving Shallow Subsidy.

25. Is there ongoing case management during those 2 years?

Yes. VA anticipates that most Veterans who receive Shallow Subsidies would generally need a lower level of case management services than, for instance, those Veterans who need the intensity of HUD-VASH. However, this may not always be the case. A Veteran household may have sufficient income that doesn't require the deep subsidy of HUD-VASH but still need ongoing services. Another Veteran may not need intense services until a crisis occurs, at which point SSVF services should be intensified consistent with progressive assistance. At a minimum, VA requires a grantee to check in with the Veteran at least monthly to ensure the Veteran's portion of the rent is paid and no major housing crises are occurring. VA also encourages a grantee to coordinate and communicate with a landlord to mitigate against any eviction issues or potential housing loss.

Commitment Timelines

26. Can an SSVF grantee make less than a two-year commitment to a Veteran household who does not need that length of subsidy?

No, each Veteran shall receive the full length of Shallow Subsidy available to them – 2 years. Veterans can only be exited if they request to be exited (as SSVF is a voluntary program), receive another federal subsidy like a Housing Choice or HUD-VASH voucher (among others), if they leave the area or abandon the unit and cannot be located, or if a Veteran is incarcerated, hospitalized, or in rehab for a period of more than 90 days. Please see the attached link for information at [Shallow Subsidy VASH Coordination And Progressive Assistance.pdf](#)

27. What is the guidance if a Veteran gets incarcerated or goes to institutional care during Shallow Subsidy enrollment?

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

A Veteran who is incarcerated or goes into an institution (hospital, rehab, etc.) for more than 90 days shall be exited from SSVF and the grantee should seek to end the lease for the unit, or work with the landlord to fill that unit with another SSVF household. A Veteran who enters an institution, including incarceration, for 90 days or less may remain in the program and SSVF may pay the subsidy portion of the rent; however, the Veteran would still be responsible for his or her portion of the rent during the period of institutional care.

28. What happens if someone gets evicted even while paying the subsidy? Do we enter into a contract with the landlord that requires us to continue paying?

The grantee should not continue to pay rent in a unit where the Veteran no longer resides. A grantee may consider helping the Veteran relocate, thus avoiding the eviction, and working with the landlord to fill the unit with another SSVF household. A grantee may pay the subsidy portion of the rent during the eviction process while the Veteran remains in the unit but must be proactive in ensuring the Veteran is paying their portion of the rent at the same time.

Homeless Management Information System (HMIS)

29. Does Shallow Subsidy need to be in a separate HMIS project(s)?

No, Shallow Subsidy is an additional service that SSVF providers can offer; it is not a separate project in HMIS.

30. Will a Veteran household who receives services in Shallow Subsidy be considered a duplicate in regards to HMIS? Will the Veteran household be double-counted in HMIS?

No, the Veteran household would be getting the added service of Shallow Subsidy. The Shallow Subsidy service is not a separate project under a separate grant; it is an added service within SSVF. Veterans are NOT exited and re-enrolled because of Shallow Subsidy; it is merely a different service under the same enrollment.

31. How often are grantees required to document income in HMIS?

A grantee must document a Veteran household's income on a quarterly basis; it is required that this information be entered into HMIS. This HMIS entry does not impact eligibility until the 2-year recertification period for the Shallow Subsidy ends.

32. Are we creating separate categories for Shallow Subsidies?

No, a Veteran will still be enrolled as either Homelessness Prevention or Rapid Rehousing, but the Veteran will be receiving a Shallow Subsidy service under SSVF.

33. How are Shallow Subsidy services documented in HMIS?

A SSVF grantee must document each monthly check-in with the Veteran in HMIS by entering a case management service under V2 Services Provided response # 7 *Extended Shallow Subsidy*; the grantee must document all TFA rental payments in HMIS by entering the date and amount of financial assistance and selecting HMIS data element V3 Financial Assistance Type – response # 15 *Extended Shallow Subsidy – Rental Assistance*. The Grantee shall also document Veteran income in HMIS on a quarterly basis.

Coordination of Services

34. Can Shallow Subsidy be combined with GPD Case Management services or is that double-dipping?

Veteran households participating in the GPD Case Management Program are not allowed to receive case management services from other sources, including SSVF. However, GPD may exit Veterans into a Shallow Subsidy

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

so it may be necessary for coordination purposes to briefly co-enroll Veterans during the transition into permanent housing.

35. Could a Veteran in GPD receive a Shallow Subsidy as part of their transition plan?

Yes, but there cannot be any overlap in case management services between time in GPD and in SSVF. Further, GPD is designed to

facilitate the movement to permanent housing without further VA assistance. SSVF grantees should be very clear about the circumstances under which a GPD participant would move directly into Shallow Subsidy. It is more likely, consistent with Shallow Subsidy overall, that a Veteran in GPD would be served by traditional SSVF services and then later is identified as an appropriate case to receive the longer-term Shallow Subsidy service.

36. Can SSVF Shallow Subsidies be combined with other non-SSVF rental subsidies?

The VA encourages each SSVF grantee to review the regulations for each funding source before combining them with Shallow Subsidies to ensure that this is not a prohibited activity. Shallow Subsidy funding can be combined with local or state-funded rent subsidies; the combination of subsidies cannot equal more than the entire rent amount of the unit. A Shallow Subsidy payment cannot be used to pay the tenant portion of rent or combined with federal subsidies such as HUD-VASH, Section 8 Housing Choice Voucher, CoC and ESG funded Rental Assistance, Mainstream Voucher Program, HOME Tenant-Based Rental Assistance (TBRA), Section 811 Project Based Assistance (Section 811 PRA), Section 202 or 811 with a Project Rental Assistance Contract (PRAC) or any other program that is originally funded by the Federal government, even if the program is administered by states or localities. While there is a prohibition on combining Shallow Subsidy with federal subsidies, there is not a prohibition on providing case management services or other specialized services (e.g. legal assistance or Healthcare Navigation services) during transitions between subsidies for a limited period of time.

37. Can the Shallow Subsidy be applied to senior housing, permanent supportive housing or tax credit housing?

Federal rent subsidy programs include: HUD-VASH, Section 8 Housing Choice Voucher, CoC and ESG funded Rental Assistance, Mainstream Voucher Program, HOME Tenant-Based Rental Assistance (TBRA), Section 811 Project Based Assistance (Section 811 PRA), Section 202 or 811 with a Project Rental Assistance Contract (PRAC) or any other program that is originally funded by the Federal government, even if the program is administered by states or localities. These federal rent subsidy programs provide a full rent subsidy where the tenant share of the rent is set at 30% of the household's adjusted gross income. SSVF Shallow Subsidy funding cannot be combined with these Federal Rent Subsidy Programs. While there is a prohibition on combining Shallow Subsidy with federal subsidies, there is not a prohibition on providing case management services or other specialized services (e.g. legal assistance or Healthcare Navigation services) during transitions between subsidies for a limited period of time.

If a unit is within a senior housing, permanent supportive housing or tax credit financed affordable rental housing development/project supported by any of these federal rent subsidy programs, SSVF Shallow Subsidy funding cannot be used in that particular unit in the project.

If a unit within a senior housing or tax credit financed affordable rental housing development/project is set at an affordable rent level (typically at a rent affordable to households at 50% or 60% Area Median Income) and is not supported by one the federal rent subsidy programs listed above, then SSVF Shallow Subsidy funding can be combined to support a Veteran household in that unit.

When considering referrals to potential permanent rent subsidies or affordable housing projects for each Veteran enrolled in shallow subsidy, it is important to review a range of considerations including: special voucher or project eligibility requirements (e.g. elder status), location and amenities of the project (e.g., Does the location and amenities meet the housing preferences/choice of the Veteran?), housing or voucher affordability to ensure a long-

Supportive Services for Veteran Families

Shallow Subsidy Service FAQs

Version 3. December 2021

term tenancy for the Veteran (e.g., Is the tenant rent share requirement sustainable for the Veteran without the shallow subsidy?) and estimated wait list time (e.g., Is the estimated wait list time for the permanent rent subsidy or housing project feasible for the Veteran to reasonably bridge from the shallow subsidy to this permanent option?).

38. What happens if a Veteran household requires assistance with the full rent amount when they are participating in Shallow Subsidy?

A Veteran household may not receive full SSVF TFA Rental Assistance while the Veteran is participating in Shallow Subsidy. If a Veteran is no longer able to pay their portion of rent, it is allowable to transition the household to traditional SSVF services so that their full portion of rent can be paid using SSVF TFA Rental Assistance. A Veteran must be recertified to verify SSVF eligibility immediately prior to transitioning the household to traditional SSVF.

Glossary

Progressive Assistance/Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.

Rent Reasonableness means the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not exceed rents charged by the property owner during the same time period. Additional information on Rent Reasonableness can be found at [Rent Reasonable](#).

Subsidy Amount is the amount of rental assistance paid under Shallow Subsidy.

Shallow Subsidy provides rental assistance to very low-income and extremely low-income Veteran households who are enrolled in SSVF's Rapid Rehousing or Homeless Prevention projects. It is likely that most participants will have already received rental assistance via traditional SSVF projects (Rapid Rehousing or Homeless Prevention) but remain rent burdened.